

(1)

## United States District Court

## DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

Criminal Complaint

v.  
SHANNOEN E. MOORECASE NUMBER: 06-98M

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 14, 2006 in the District of Delaware, defendant did:

knowingly possess in and affecting interstate commerce, a firearm, that is, a Kel Tec 9 mm, serial number 136255, after having been convicted on or about April 8, 2002, of a crime punishable by imprisonment for a term exceeding one year.

in violation of Title 18 United States Code, Section(s) 922(g)(1) and 924(a)(2).

I further state that I am a(n) Special Agent, ATF and that this complaint is based  
Official Title  
on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof: Yes

Signature of Complainant  
DAVID DI BETTA  
Special Agent,  
Bureau of Alcohol, Tobacco Firearms and Explosives

Sworn to before me and subscribed in my presence,

August 28, 2006 at  
Date

Honorable Mary Pat Thyng  
United States Magistrate Judge  
Name & Title of Judicial Officer

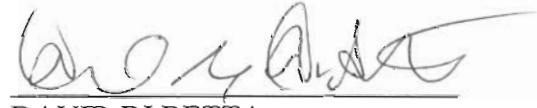
Wilmington, DE  
City and State

Signature of Judicial Officer

AFFIDAVIT

I, David M. DiBetta, being duly sworn, depose and state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, located in Wilmington, DE.
2. Defendant Shannoen E. Moore has a April 8, 2002, conviction for a felony for maintaining a vehicle for keeping controlled substances in Superior Court of the State of Delaware in and for New Castle County.
3. On June 14, 2006 Wilmington Police arrested Shannoen E. Moore after receiving call for a man with a gun. As police officers arrived they spotted Mr. Moore who matched the description over the police radio. Mr. Moore spotted the officers and was ordered to stop. Mr. Moore then ran from the officers and a foot pursuit followed. Mr. Moore was then stopped by the officers, and a struggle ensued. After rolling Mr. Moore onto his side the officers observed a hand gun lying directly under him. During Moore's arrest the police recovered a firearm, a loaded Kel Tec, 9mm, semi-automatic handgun, and serial # 136255.
4. Your affiant is aware that there are no firearms manufactured within the state of Delaware by Kel Tec.
5. Based on the foregoing facts, Affiant submits that there is probable cause to believe that Shannoen E. Moore has committed a violation of Title 18, United States Code, Section 922(g)(1), and therefore respectfully requests that the Court issue a criminal complaint and arrest warrant for Moore.



DAVID DI BETTA  
Special Agent  
Bureau of Alcohol, Tobacco Firearms and Explosives